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February 5, 2024

Via ECF

The Hon. Ann Marie Donio, U.S.M.J.
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Duong v. Pressler Felt and Warshaw
Case No. 1:22-cv-05630-KMW-AMD

Dear Judge Donio:

Plaintiff submits this joint status letter on behalf of the parties as a follow-up to the last telephone status conference with the Court regarding the briefing schedule for the parties' respective motions for summary judgment.

During that last conference, Defendant suggested that the motions for summary judgments be filed as cross-motions, with Plaintiff filing the initial motion for summary judgment, Defendant responding filing opposition and its cross-motion for summary judgment, Plaintiff filing its Opposition and Reply, and then Defendant filing its Reply in support of its cross-motion, with each party filing only two briefs rather than three. The parties have subsequently agreed to this format, with the proposed briefing schedule as follows:¹

Plaintiff's Motion for Summary Judgment	February 20, 2024
Defendant's Opposition and Cross-Motion	March 21, 2024
Plaintiff's Reply and Opposition to Cross-Motion	April 18, 2024
Defendant's Reply	May 2, 2024

The foregoing schedule is subject to the outcome of Plaintiff's pending discovery dispute motion/letter regarding objections at Defendant's 30b(b)(6) deposition filed on January 18, 2024 and currently pending before Your Honor. (Dkt. No. 34).

¹ Given the modified briefing format for cross-motions for summary judgment, and other scheduling issues, the parties request the briefing begin on February 20, rather than February 9 as originally set by the Court.

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Thank you for your consideration.

Very truly yours,

/s/Lawrence Hersh
Lawrence Hersh